



CITY OF NEW BEDFORD
SCOTT W. LANG, MAYOR

***Response to Comments Received on the
WALSH FIELD RELEASE ABATEMENT MEASURE (RAM) PLAN
November 20, 2009***

The following are comments (shown in italics) received by the City on the RAM Plan for Walsh Field. The City's response follows each comment.

1. This RAM plan prepared by the City of New Bedford TRC Companies Inc., how will the public have access to the plan and not only that but also explained to the public in public language not scientific?

The Release Abatement Measure (RAM) Plan was posted on the City's and the Massachusetts Department of Environmental Protection's (MassDEP's) websites on October 7, 2009. A hard copy is also available for review by appointment in the City's Environmental Stewardship Department located in City Hall, 133 William Street, New Bedford, MA 02740. The availability of the document was advertised in the *Standard Times*, *O'Jornal* and *Latino Express* on October 30, 2009 and with direct mailings or email to individuals on the Public Involvement Plan mailing list. The notice announced the beginning of the 20-day comment period, which ends on November 19, 2009.

A summary of the RAM Plan in non-scientific language is on the City's website at http://www.newbedford-ma.gov/McCoy/2009/Walsh_Field_Release_Abatement_Measure_Summary.pdf.

2. What are the 11 discreet areas of the Walsh Field Athletic Complex or information? (past findings?)

Soils requiring excavation are interspersed throughout Walsh Field in eleven areas where chemicals have either been detected or are suspected to be present at concentrations above state standards. These areas were targeted for removal to achieve "No Significant Risk" for the top three feet of soil. "No Significant Risk" is a level of risk that requires no further action to address the chemicals. The limits of excavation were determined by performing a Risk Characterization in accordance with state requirements. The eleven areas are listed below:

- WFA-11
- WFB-11
- WFC-13
- WFD-13
- WFF-5

- WFA-10
- WFD-6
- SB-233
- WFG-7
- Junior Varsity Field
- Varsity Field

Drawing C-101, located in Appendix B of the RAM plan is a plan that illustrates where the areas of excavation will occur.

3. *Where is the soil being transported & disposed?*

Soil excavated from the 11 areas will be loaded onto trucks and moved to a stock pile area on the east side of Walsh Field. The stockpile will be placed on plastic and securely covered with plastic. The stockpile will be tested to determine the type of facility which will be used to dispose of the soil. If necessary, the soil may be stabilized, or treated on site, prior to disposal. Stabilization keeps certain chemicals, such as lead, from leaching from the soil in a disposal facility.

4. *Where are the tests results that says these soil is free of contaminants?*

The City assumes that you are referring to soil that will be brought to the site and used to backfill excavated areas. This soil will be certified as clean soil based on appropriate chemical concentration data prior to delivery to the site for use as backfill.

5. *Are the city's workers working on this site working under TOSCA? how do we know the city is educating the workers about the environment they're working in? they didn't do it for Keith.*

The Walsh Field site is not regulated pursuant to the Toxic Substances Control Act (TSCA) because polychlorinated biphenyls (PCBs) have not been detected at concentrations that are subject to United States Environmental Protection Agency (EPA) jurisdiction. In fact, most of the results for PCB analysis at Walsh Field were below laboratory detection limits, with the highest PCB concentration detected in soil of 0.19 mg/kg being significantly lower than the EPA (1 mg/kg) and MassDEP (2 mg/kg) soil cleanup standards.

The work will be performed by contractors (D.W. White and Son and Triumvirate Environmental Inc.) to the City of New Bedford. All personnel will be trained in accordance with Occupational Safety and Health Administration (OSHA) requirements. OSHA requires that all work be performed under a Health & Safety Plan prepared by each party performing the work. The Health and Safety Plan is prepared based on site conditions, including chemicals of concern at the site. The employer is responsible for ensuring their employees are aware of all hazards present on the site.

6. *How is the city reaching out to the public to get comments related to the RAM plan? Obviously they didn't follow regulations at Keith.*

The availability of the document was advertised in the *Standard Times*, *O’Jornal* and *Latino Express* on October 30, 2009 and with direct mailings or email to individuals on the Public Involvement Plan mailing list. The notice announced the beginning of the 20-day comment period, which ended on November 19, 2009.

7. *What is MCP Category S-1?*

In the RAM plan, MCP Category S-1 refers to a category of soil cleanup standards published in the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000), the regulations that govern cleanup of contaminated sites in the Commonwealth of Massachusetts. Category S-1 soils are associated with the highest potential for exposure and thus are the lowest – and therefore most health protective - cleanup standards that have been established by the state. Soil meeting Category S-1 cleanup standards are suitable for use in a residential yard. The actual value of the S-1 soil cleanup standard is specific to the chemical of concern and the groundwater classification in the area to be cleaned up.

8. *Does the RAM plan have a map that identifies the area and the numbers of excavation feet?*

Drawings C-101, C-101A, C-101B, and C-101C, in Appendix B of the RAM plan, show the areas where excavation will occur and the dimensions of each area. The areas identified will be excavated to a depth of 1.5 to 3 feet below ground surface, depending on the area.

9. *For the properties are we are looking for something similar to this RAM plan that will be provided by EPA? are there any differences in the plan other then the money aspect and EPA regulations?*

Because the Walsh Field cleanup is not regulated pursuant to TSCA, the City is not required to file a similar plan with EPA for the cleanup. However, EPA has been provided a copy of the RAM plan as a courtesy and to facilitate technical and regulatory discussions.

On another note like tommy mentioned at the clean board meeting, how about if the high school is built where the athletic complex is being built and demolish the old high school and make it a clean field. It would make so much more sense. Come on... why continue to keep the kids on that high school? what motivation will a student have once they have full knowledge of the environment they are in, in order to get an education (their health or education will be their question.) Wow how can those who are supposed to look for the best interest of a child's education make the decision to just patch boobos and not remediate the problem as they should. You would think they would want to be investing in the future (OUR CHILDREN) of New Bedford.

The City’s environmental consultant is presently developing a remedial approach for the New Bedford High School campus. The City’s goal, as always, is to facilitate a technically sound, safe, and cost-effective remedy for the site. Demolition of the school is not required to implement a remedy.